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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:	CHAPTER 13
Scott A. Boles and Carolee A. Boles	CASE NO. 17-20828-CMG
Debtor	<u>NOTICE OF MOTION TO EXTEND THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(c)(3)(B)</u>

To: ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that on June 21, 2017 at 09:00am, or soon as counsel may be heard, the undersigned, attorneys for Gennaro Franzese, the Debtor, will move before the Honorable Christine M. Gravelle, Courtroom #3, United States Bankruptcy Court, 402 East State Street, Trenton, NJ 08608, for an Order Granting Debtor's Motion to Extend the Automatic Stay.

TAKE FURTHER NOTICE that the facts DANN & MERINO, P.C. relies upon, as set forth on the accompanying Certification of Javier L. Merino, Esq. and legal brief.

If you oppose the motion you must file a response within the time provided under the Rules of Bankruptcy Procedure and Local Rules. If you do not file a timely response then the requested relief may be entered without hearing.

A proposed form of Order is submitted herewith.

DATED: May 31, 2017

DANN & MERINO, P.C.
Attorney for Debtor

/s/ Javier L. Merino
Javier L. Merino